

REMARKS

Claims 1-8, 10-18, 23-29, 31-35, 37-39, 41-43, 45, and 46 are pending in the current application, with claims 9, 19, 21, 22, 30, 36, 40, and 44 being cancelled by this Amendment. Claims 1-19 and 21-46 currently stand rejected, and claims 1-8, 10, 17, 18, 23-27, 33, 38, 42, and 46 have been amended. Reconsideration and withdrawal of the claim rejections are respectfully requested in light of the preceding amendments and following remarks.

Claim Rejections – 35 U.S.C. § 103

Claims 1-4, 9-19, and 21-46 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over US Pat Pub 2002/0106196 to Yamauchi et al. ("Yamauchi") in view of US Pat Pub 2001/0043790 to Saeki et al. ("Saeki"). Applicants traverse these rejections for the reasons detailed below.

With regard to claim 1 as previously presented, the Examiner alleges that Saeki discloses "a management area separate from the data area, the **management area storing an entry point map,**" which is admittedly lacking from Yamauchi. The Examiner applies the AV Data Management File in FIG. 6 of Saeki as the recited separate "management area" and the Consecutive Recording Management Table in FIG. 5 of Saeki for the entry point map. Applicants respectfully submit that the **Consecutive Recording Management Table is not stored in the AV Data Management File** in Saeki, such that Saeki does not teach or suggest a "management area storing an entry point map." Rather, the **Consecutive Recording Management Table is not**

recorded in a fixed area, because it has both AV and non-AV properties. See Saeki, ¶ [0083]. Thus, Saeki does not teach or suggest a separate “management area storing an entry point map” as recited in claim 1.

Further, claim 1 as previously presented recited “clip files” that are “**separate clip files**” in a data area. The Examiner alleges that Yamauchi discloses separate clip files in its abstract, by its sets of sub-picture data or the sub-pictures themselves. Applicants respectfully submit that Yamauchi discloses “sets of sub-picture data **in a same stream** as the main video data.” The streams in Yamauchi are not divided into separate files; rather the streams are a seamless, multiplexed collection of several types of data used for AV reproduction. See Yamauchi, ¶ [0117]. Where Yamauchi discusses files, it is only for high-level Video Title Set files that contain entire sets of streams. See Yamauchi, ¶ [0112], FIG. 5B. Thus, the sub-picture data of Yamauchi cannot be “separate clip files” because the sub-picture data and sub-pictures are included in a single stream, not separate clip files.

Yamauchi, which admittedly does not teach or suggest a “management area storing an entry point map,” does not make up for the differences between Saeki and claim 1, discussed above. Similarly, Saeki, which does not disclose separate clip files, does not cure the differences between Yamauchi and claim 1, also discussed above. Thus there are clear, significant differences in file structure and management functionality between claim 1 and Yamauchi and Saeki, alone or in combination, such that these references cannot anticipate or render obvious claim 1. Claims 23-26 are equally allowable over Saeki and

Yamauchi because they recite the unique features of claim 1 discussed above. Claims 2-4, 9-18, 27-29, 31-35, 37-39, 41-43, 45, and 46 are allowable at least for depending from an allowable base claim. Withdrawal of the rejection under 35 U.S.C. § 103(a) to claims 1-4, 9-19, and 21-46 as previously presented is respectfully requested.

With regard to claim 11, the Examiner alleges that Yamauchi discloses “each data unit in a clip file has a **same number of entry points**” as recited in that claim as previously presented, by Yamauchi's disclosure of VTS internal search pointers, which are a type of PGC link information. Applicants respectfully submit that Yamauchi nowhere indicates that these search pointers are “entry points” – indeed they appear to be mere **identifiers** of title and title set number. See Yamauchi, ¶ [0188]. Further, Yamauchi indicates that the VTS internal search pointers are user-set, such that different titles may have **different numbers of search pointers, depending on user discretion**. See Yamauchi, ¶ [0188]. Thus, Yamauchi does not teach the equal entry points among data units as recited in claim 11, which Yamauchi is alone applied for teaching.

With regard to claim 13, which as previously presented recites “entry point map includes at least one flag associated with the at least one entry point, the at least one **flag** identifying **whether jumping to another clip file is permitted** in relation to the at least one entry point,” the Examiner alleges that Yamauchi teaches the recited flags with its PGC link and sub-picture mapping

information. Applicants respectfully submit that the PGC link and sub-picture mapping information is not a “flag” but rather an array of several pieces of information. See Yamauchi, FIG. 15. Applicants further submit that the information in the PGC link table and sub-picture mapping do not indicate whether jumping is **permitted**; they indicate **how** the jump is to occur. See Yamauchi, ¶¶ [0192], [0198]. It is not reasonable to interpret permission to perform a jump as instructions for doing so. Thus, Yamauchi does not teach the flags indicating jump permission as recited in claim 13, which Yamauchi is alone applied for teaching.

Saeki, which is not applied for the entry points or jump flags discussed above, does not cure the differences between Yamauchi and claims 11 and 13. Thus there further differences in content between the applied references and claims 11 and 13, such that these references further do not anticipate or render obvious claims 11 or 13. Claims 29, 32, 34, 39, 43, and 45 are equally allowable over Saeki and Yamauchi because they recite the unique features of claims 11 and/or 13 discussed above. Withdrawal of the rejection under 35 U.S.C. § 103(a) to these claims as previously presented is respectfully requested.

Reopening of Examination and Examiner Interview Requested

Applicants note that the above-discussed differences between the applied references and the claims are applicable to the claims as previously presented and currently amended. In light of the multiple distinctions between the

claimed subject matter and the teachings of the prior art, Applicants respectfully request that prosecution be reopened and the claims as previously presented and amended be given new search and consideration. Further, Applicants respectfully request an in-person interview with Examiner Shibru and her supervisor, Thai Tran, in order to discuss the claim distinctions discussed above. Applicants will contact the Examiner and her supervisor upon filing this response in order to schedule the in-person interview.


CONCLUSION

For the above stated reasons, reconsideration and withdrawal of the pending rejections and favorable allowance of all claims 1-8, 10-18, 23-29, 31-35, 37-39, 41-43, 45, and 46 in the instant application are earnestly solicited. In the event that any matters remain at issue in the application, the Examiner is invited to contact the undersigned.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,
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